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HEARING DATE: April; 28, 2016, 10:00 a.m.
OBJECTION DEADLINE: April 21, 2016, 4:00p.m.
REPLY DEADLINE: April 27, 2016, 10:00 a.m.

Attorneys for Avon Group Limited Liability Company

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
 :
MOSDOS CHOFETZ CHAIM, INC., :
 : Chapter 11
 :
Debtor. : Case No.
 : 12-23616 (RDD)
 :
-----X

**NOTICE OF MOTION OF AVON GROUP LIMITED LIABILITY
COMPANY FOR (1) REPLACEMENT OF ESTATE LITIGATION
REPRESENTATIVE OR, IN THE ALTERNATIVE, (2) APPOINTMENT
OF A CHAPTER 11 TRUSTEE**

PLEASE TAKE NOTICE that on April 28, 2016, at 10:00 a.m., or as soon thereafter as counsel may be heard, Avon Group Limited Liability Company (“Avon”), a creditor and party-in-interest in this bankruptcy case, by and through its counsel, Loeb & Loeb LLP, will move pursuant to the annexed Motion before the Honorable Robert D. Drain, United States Bankruptcy Judge, Room 248 at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, for (1) entry of an Order directing the replacement of the estate litigation representative, or, in the alternative, (2) entry of an order appointing a Chapter 11 Trustee.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be made in writing, filed, and served so as to be actually received by the Court and by the undersigned not later than April 21, 2016 at 4:00 p.m. All objections must specifically state the interest that the objecting party has in this proceeding and the specific legal and factual bases for any objection to the Motion or entry of the Order.

PLEASE TAKE FURTHER NOTICE that, to the extent any written objections to the Motion are filed, any reply papers submitted by Avon must be filed by no later than 10:00 a.m. on April 27, 2016.

PLEASE TAKE FURTHER NOTICE that, to the extent the hearing to consider the Motion and any related objections is adjourned, Notice(s) of Adjournment may be filed without further mailed notice to the parties-in-interest.

Dated: New York, New York
February 18, 2016

LOEB & LOEB LLP

By: /s/ P. Gregory Schwed
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